

Proceeding: In the Matter of Amendment to Part of the Commission's Rules to Revise Rules Record 1 of 1
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To:	FCC Comments
From:	Richard Coleman, Chairman & CEO, WP&L Corporation
Date:	9/16/98
Re:	Proceeding 98-136

NOTICE OF PROPOSED RULEMAKING

51. WP&L concurs with FCC 47 Ghz band should be acquired through competitive bidding. WP&L believes commercial interests should have precedence over Government interests in the 47 Ghz band, since the Government has primacy in many other frequencies. Government should, however, be able to co-share the frequency if it does not interfere with commercial interests licensing the frequency.

52. WP&L concurs.

56. WP&L concurs with services FCC outlines to be permitted in 47 Ghz range.

59. WP&L maintains it should be incumbent upon non-stratospheric platform providers to demonstrate non-interference to stratospheric platforms.

61. WP&L argues the Government should not be a co-primary spectrum user, rather, Government should coordinate with commercial interests.

67. WP&L concurs with the FCC's view "the licensee will be able to provide all allowable services anywhere within its licensed area, at any time . . .".

74. WP&L concurs with FCC “to foster competition in those markets, it may be appropriate to ensure that ownership of this spectrum is not overly concentrated.”

77. WP&L favors US ownership to the maximum extent possible, operating within international agreements.

83. WP&L believes the FCC should use the MTA approach rather than the suggested REAG approach. The MTA method will provide for more competitive bidding, helping ensure single bidders won't lock up entire the entire proposed spectrum and, thus, control the sub-dividing spectrum. Huge REAG bidding areas run completely counter to the business strategy of certain prospective HAPS service providers, which would prefer smaller MTA areas to huge REAG areas. The MTA method fits the concept of operations much better for certain prospective service providers than huge REAGs, in fact the latter approach may be necessary to ensure a number of serious competitor bidders for the 47 Ghz band. The FCC should not force businesses to bid on areas far larger than areas in which they are interested.

88. WP&L concurs.

89. WP&L concurs.

114. Due to high rain attenuation in the 47 Ghz band, 16 dbW is too restrictive. What makes more sense is to allow for higher EIRP, allowing economics to sort out power levels, rather than arbitrarily setting limits on transmit power. FCC must differentiate between up and down links: the power level can be somewhat lower for the uplink and should be somewhat higher for the downlink.

137-138. WP&L maintains HAPS should have primary, rather than co-primary status in the 47 Ghz band. FCC should work with industry to set a timetable to formalize HAPS as the primary user of this band.

140. FCC should not allow surface users to interfere with HAPS in the 47 Ghz band.

141. WP&L maintains FCC should use a power-flux-density approach, combined with some frequency coordination.

142. WP&L concurs with view of Sky Station regarding safety and its claim, "that any damage on Earth is no more likely to occur than from satellite launch and de-orbit operations."
143. WP&L believes Motorola hasn't done their homework on this issue and should get some airship experts to evaluate High Altitude Platform Stations, rather than satellite engineers, before making such comments. WP&L believes Motorola fears HAPS may cut into their market for satellite delivery of telecommunications services.
144. WP&L believes all such regulatory and safety issues should be worked out between industry and the FAA, FCC does not need to get involved.